

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JULIE DALESSIO, an individual,  
Plaintiff,  
v.  
UNIVERSITY OF WASHINGTON,  
Defendant.

No. 2:17-cv-00642-RSM  
DECLARATION OF DEREK C. CHEN

I, Derek C. Chen, declare as follows:

1. I am one of the attorneys representing the Defendant in this lawsuit. I make this declaration based upon my own personal knowledge, upon facts which are admissible in evidence. I am competent to testify to the matters set forth in this declaration.

2. The parties met and conferred via telephone pursuant to FRCP 26 on October 23, 2017, regarding Plaintiff's first two sets of interrogatories and requests for production of documents. While the discussion was productive, the parties were unable to agree regarding *at least* a majority of the items in dispute. Defendant filed a motion for summary judgment on August 24, 2017, which could potentially dismiss all or a portion of Plaintiff's claims, and therefore agree to stipulate to extending the discovery cutoff and discovery motions deadline.

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DECLARATION OF DEREK C. CHEN - 1  
2:17-cv-00642-RSM

**KEATING, BUCKLIN & McCORMACK, INC., P.S.**

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1 I declare under penalty of perjury under the laws of the State of Washington that the  
2 foregoing is true and correct to the best of my knowledge.

3 DATED this 25<sup>th</sup> day of October, 2017, at Seattle, Washington.  
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5 /s/ Derek C. Chen  
6 Derek C. Chen, WSBA #49723  
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